

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTSFILED
IN CLERKS OFFICE

2004 MAY 25 P 12:27

AMERICAN EXPRESS FINANCIAL ADVISORS, INC.,)	U.S. DISTRICT COURT DISTRICT OF MASS.
)	Civil Action No. 04-10979 RGS
Plaintiffs,)	<i>FILING FEE PAID</i>
v.)	<i>RECEIPT #</i>
MARY R. DeGON and MATTHEW M. BRUCE,)	<i>AMOUNT \$ 50.00</i>
)	<i>BY DPT YORK</i>
Defendants.)	<i>DATE 5/25/04 JH</i>

MOTION TO ADMIT COUNSEL PRO HAC VICE

James Baldassini, one of the attorneys for Defendants Mary R. DeGon and Matthew M. Bruce, respectfully requests that this court enter an order allowing Anthony Paduano to appear pro hac vice as additional counsel in the captioned case. In support of this motion, movant shows as follows:

1. Anthony Paduano is licensed to practice law in the State of New York, and a member in good standing of the bar of the state of New Jersey and of the following Federal Courts: District of New Jersey, Southern District of New York, Eastern District of New York, Northern District of New York, Eastern District of Michigan, United States Court of Appeals for the Third Circuit, United States Court of Appeals for the Second Circuit, and the United States Supreme Court. There are not now and have never been any disciplinary proceedings or investigations concerning Anthony Paduano in any jurisdiction. Anthony Paduano has been practicing law for over twenty years and has represented clients in cases before state and federal courts. Please see attached certificate of good standing.

2. Anthony Paduano is a partner with the firm of Paduano & Weintraub LLP, located at 1251 Avenue of the Americas, Ninth Floor, New York, New York 10020, phone number (212) 785-9100.

3. Anthony Paduano is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

4. Movant is a member in good standing of the Massachusetts State Bar, of this Court, and has been admitted to practice before this court since 1984.

HEREFORE, premises considered, movant respectfully requests that this Court enter an order allowing Anthony Paduano to appear pro hac vice for the purpose of representing Defendants Mary R. DeGon and Matthew M. Brucc as additional counsel in this case.



James Baldassini, Esq.
Baldassini & Baldassini
59 Winter Street
Weymouth, Massachusetts 02188
(781) 337-3008

Co-Counsel for Defendants Mary R. DeGon and Matthew M. Brucc